

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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**PREZERV TECHNOLOGIES, INC.,**

**Plaintiff,**

**v.**

**ALESSANDRO MORARI, GIACOMO  
DOMENICONI, BARTOLOMEO  
GAROFALO, and SOLIDIUM AI, INC.,**

**Defendants.**

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**Civil Action No.  
1:21-cv-11918-FDS**

**PRELIMINARY INJUNCTION**

**SAYLOR, C.J.**

Alessandro Morari, Giacomo Domeniconi, Bartolomeo Garofalo, and Solidium AI, Inc., their officers, agents, employees, attorneys, and those persons in active concert with them who receive actual notice of this Order (“Defendants”) are hereby preliminarily enjoined as follows:

1. Defendants are hereby restrained from taking any and all action to conceal their alleged misappropriation of Prezerv Technologies, Inc.’s confidential information, trade secrets, and/or assets.
2. Defendants shall immediately cease all access to and/or opening, copying, transferring, deletion, destruction, or manipulation of any and all data concerning Prezerv Technologies, Inc. and/or Solidium AI, Inc., including but not limited to all data on any devices (e.g., laptops and smart phones), drives (e.g., external hard drives), or online storage

repositories or platforms (e.g., Google, Slack, GitHub, Monday.com, IBM, AWS, Microsoft Azure) except as necessary to comply with this order. Defendants may resume access to all pertinent devices, drives, and online storage repositories only after completing the collection and preservation efforts described below.

3. Defendants shall, no later than within one day of receiving this order, contact counsel for plaintiff Prezerv Technologies, Inc. to coordinate the collection and preservation of all data on all devices controlled by or in the possession of Defendants. This includes all laptops, desktops, external hard drives and storage devices (including any and all that have been connected to any laptop, desktop, or otherwise that stored Prezerv Technologies, Inc.'s confidential information and/or trade secrets at any time), cell phones, online storage ("cloud") drives, and online platforms (e.g., Google, Slack, GitHub, Monday.com, IBM, AWS, Microsoft Azure). Such collection and preservation must be completed within ten days of this order unless further time is granted. The parties shall confer in good faith to select a third-party vendor to conduct this collection and preservation, but the failure to come to an agreement shall not excuse any delay in completing the collection and preservation. The data collected and preserved through these efforts shall remain in the possession of the collecting vendor, with no access provided to either Prezerv Technologies, Inc. or Defendants, unless and until either (1) an agreement is reached between the parties concerning access or (2) there is further order of this Court.

4. Within ten days of this order, Defendants shall produce an index of all devices and drives not already returned to Prezerv Technologies, Inc. that ever contained any data, documents or otherwise constituting Prezerv Technologies, Inc.'s confidential information and/or trade secrets or any data, documents or otherwise derived from the same. Defendants

shall certify under oath to the accuracy and completeness of this index and that all data from the devices and drives listed thereon has been collected and preserved as discussed above.

5. Defendants are temporarily restrained from conducting any business relying upon any of Prezerv Technologies, Inc.'s confidential information, trade secrets, and/or other assets. This includes but is not limited to being restrained from accepting any or all funds or capital from any or all potential investors, partners, and/or customers. It also includes drafting or submitting any patent applications or taking any further effort to obtain any potential patent.

**So Ordered.**

Dated: December 7, 2021, 5:24 p.m.  
Boston, Massachusetts

/s/ F. Dennis Saylor IV  
F. Dennis Saylor IV  
Chief Judge, United States District Court